

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**PLAINTIFF’S FIRST SET OF INTERROGATORIES [NOS. 1-10]**

Under Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff, Singular Computing LLC (“Singular”), hereby submits these interrogatories to Defendant, Google LLC (“Google”).

Pursuant to Federal Rules of Civil Procedure 33(b)(2), Defendant must answer these interrogatories within 30 days. Pursuant to Federal Rule of Civil Procedure 33(b)(3), Defendant must answer each interrogatory separately and fully in writing and under oath, applying the Definitions and following the Instructions set forth below.

**DEFINITIONS**

1. All Definitions and rules of construction incorporate the obligations set forth in L.R. 26.
2. “Accused Products” means all accused products, computer systems, devices, and other hardware or software identified in Plaintiff’s Amended Complaint (Dkt. No. 37) and in Plaintiff’s Infringement Contentions, including without limitation at least:
  - a. Google Cloud Tensor Processing Unit Version 2 (“TPU v.2”), including software that runs workloads on TPU v.2, including TensorFlow;

- b. Google Cloud Tensor Processing Unit Version 3 (“TPU v.3”), including software that runs workloads on TPU v.3, including TensorFlow;
- c. Larger compute systems that incorporate (a) or (b), such as TPU Pods.

3. “Asserted Patents” or “Patents-in-Suit” refers to U.S. Patent Nos. 8,407,273 (“’273 Patent”); 9,218,156 (“’156 Patent”); and 10,416,961 (“’961 Patent”), as well as any other patent(s) that Plaintiff asserts in this action.

4. “Communication” means the transmittal or receipt of information (in the form of facts, ideas, inquiries, or otherwise) regardless of the medium used to transmit or receive the information.

5. “Plaintiff” or “Singular” means Singular Computing LLC, its employees, agents, attorneys, representatives, or any other persons who have acted or purported to act for their behalf.

6. “Google,” “you” “Defendant” or “your” means Google, LLC, its employees, agents, attorneys, representatives, or any other persons who have acted or purported to act for its behalf. This includes Google LLC, its parents, subsidiaries, divisions, branches, predecessors, or successors-in-interest, and its agents, employees, officers, directors, and attorneys.

7. The term “identify” (with respect to persons) means to give, to the extent known, the person’s full name, present or last known address, and, when referring to a natural person, the present or last known place of employment.

8. The term “identify” (with respect to documents) means to state, to the extent known, the type of document, the document’s subject matter, the date of the document; and the document’s author(s), addressee(s), and recipient(s).